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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

BRICKLAYERS AND ALLIED CRAFTWORKERS)	Case No. CV 10-0112 EMC
LOCAL UNION NO. 3, AFL-CIO;)	
TRUSTEES OF THE NORTHERN CALIFORNIA)	
TILE INDUSTRY PENSION TRUST; TRUSTEES)	
OF THE NORTHERN CALIFORNIA TILE)	
INDUSTRY HEALTH AND WELFARE TRUST FUND;)	STIPULATION TO CONTINUE
TRUSTEES OF THE NORTHERN CALIFORNIA)	CASE MANAGEMENT
TILE INDUSTRY APPRENTICESHIP)	CONFERENCE
AND TRAINING TRUST FUND; TILE INDUSTRY)	
PROMOTION FUND OF NORTHERN CALIFORNIA,)	
INC., a not-for-profit California corporation;)	
TILE EMPLOYERS CONTRACT ADMINISTRATION)	
FUND; TRUSTEES OF THE INTERNATIONAL)	
UNION OF BRICKLAYERS AND ALLIED)	
CRAFTWORKERS PENSION FUND,)	
Plaintiffs,)	
vs.)	
ERIC LAWRENCE YOUNG, as an individual and doing)	
business as "Diablo Designs Tile And Marble";)	CMC Current Set For:
AMERICAN CONTRACTORS INDEMNITY)	Date: April 21, 2010
COMPANY, a California corporation,)	Time: 1:30 p.m.
Defendants.)	Courtroom: C (15 th Fl)
)	San Francisco

Plaintiffs and Defendant, American Contractors Indemnity Company ("ACIC"), by and through their counsel of record stipulate as follows:

1. On April 14, 2010 plaintiffs filed a request for entry of the default of Young.
2. Plaintiffs have agreed to provide ACIC withing the next 2 working days with copies of

documents from Young which Plaintiffs believe constitute an admission by Young that the principal amount owed by Young to Plaintiffs exceeds \$41,000. The maximum amount payable on the bond underwritten by ACIC in claims such as that in the instant controversy is \$4,000.

3. Plaintiffs and ACIC have quickly settled similar claims in the past.

4. ACIC is inclined to settle this matter upon reviewing the documents from Plaintiffs.

5. Plaintiffs and ACIC believe that there is a very high probability that Plaintiffs claims against ACIC will be settled within 30 days.

6. Plaintiffs intend to file a motion for default judgment against Young following entry of default by the Clerk. Plaintiffs expect to file such a motion within 90 days.

On the basis of the foregoing, Plaintiffs and ACIC request that the Court continue the case management conference, currently calendered for April 21, 2010 at 1:30 p.m., before Magistrate Judge Chen, for 90 days.

So Stipulated:

Lanak & Hanna, P.C.

Dated: April 19, 2010

By: /s/ Robert Stroj
Robert Stroj
Attorneys for American Contractors Indemnity Company

Katzenbach & Khtikian

Dated: April 19, 2010

By: /s/ Kent Khtikian
Kent Khtikian
Attorneys for Plaintiffs

Attestation Of Concurrence

I, Kent Khtikian, declare that Robert Stroj has signed the Stipulation set forth above and that I have in my possession their signatures on this document.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 20th day of April 2010, in San Francisco, California.

/s/ Kent Khtikian
Kent Khtikian

ORDER

It is hereby ordered that the case management conference in this matter currently scheduled for April 21, 2010 shall be continued to 7/28, 2010 at 1:30pm in Courtroom C, 15th Floor, 450 Golden Gate Avenue, San Francisco. A joint cmc statement shall be filed by 7/21/10.

Dated: 4/20/10

